

Comments by South Carolina Vocational Rehabilitation Department
SC OIG Case # 2017-2016
August 24, 2017

The South Carolina Vocational Rehabilitation Department appreciates the opportunity to respond to the Office of the Inspector General review of allegations related to our agency.

We agree with the report's two findings and will implement the accompanying recommendations. We will conduct reviews of existing agreements and MOUs to ensure services are consistent with provisions of the agreements and that there is proper documentation of services and deliverables received.

There are portions of the report for which we would like to offer clarifications here, for the purpose of adding context to the circumstances outlined in the report.

Page 1, para 2; page 5, section III, para 2; and pages 5 & 6, section III, para 3

Throughout these paragraphs the word "supervisor" is the term used to refer to the former staff member who was charged with misconduct with the inmates; for clarification, we'd like to note that this individual was a "maintenance coordinator" grounds keeper who coordinated daily grounds keeping duties of one or more inmates.

Page 1, paragraph 4; page 7, paragraph 1(top of page); and page 8, top sentence

To clarify the discussion concerning the creation of CRPs, we concur that a CRP is flexible enough that there is no "cookie-cutter" approach on how each state administers the VR program within the framework of 34 CFR Part 361. Most states provide a varied range of VR services through CRPs created by State vocational rehabilitation (VR) agencies through the use of the Establishment Authority. While most VR agencies chose to create CRPs which would, over a set period of time become independent, several chose to provide services with their own staff in their own facilities. Thus, SCVRD uses internal CRPs as the framework for its 26 Work Training Centers throughout the state as permitted by the Code of Federal Regulations. Using this method, SCVRD has a unique ability to monitor its service delivery system and an opportunity to effect change in the model when necessary. In addition, each VR agency is required to regularly conduct a comprehensive statewide needs assessment to, among other topics, assess the "need to establish, develop, or improve community rehabilitation programs within the State." Generally, clients hired by external employers through the CRP are considered competitively employed in an integrated setting.

Page 2, paragraph 7, and page 11, section VII, paragraph 1

We'd like to clarify the discussion concerning the creation of Allied Opportunities, Inc. in this paragraph. Allied was in fact created as a CRP by SCVRD in keeping with the federal regulations and the Rehabilitation Act of 1973. However, Allied was not an "internal" CRP as referenced in this section. SCVRD only has internal CRPs in the form of its 26 Work Training Centers strategically placed throughout the state. Allied was created to be a stand-alone non-profit 501(c) 3 after an initial period of support from the designated state agency for vocational rehabilitation, i.e., SCVRD.

This external CRP was created in accordance with regulations of the Rehabilitation Services Administration (U.S. Department of Education) and the Internal Revenue Service and the South Carolina Non-profit Corporation Act.

Page 7, section V.A., paragraph 3

Inasmuch as the Allied Opportunities, Inc. concept was a new initiative by SCVRD to enhance the ability of clients to gain and maintain competitive employment and a program that would also benefit the Agency and third-party vendors in the state with whom SCVRD maintained business contracts, the Agency Board was briefed in the early stages to introduce and explain the initiative and discuss its progress. As time went by after 2008, the initiative became a regular operating program as Allied employees (former SCVRD clients including those who were receiving follow-on services from SCVRD) were routinely assigned to SCVRD facilities in various capacities.

Page 8, section C, in the paragraph following the three bullets

In further explanation of this paragraph and by way of example, after completing the VR program successfully, a qualified client would experience extreme difficulty securing employment due to a poor work history and disability related barriers. Allied would provide the extra attention and support to allow the former client to reach their potential. Added support in the form of follow-along services to those placed in employment would be available from VR.

Page 11, section VII, paragraph 2

In addition to those appropriations paid by SCVRD to Allied, we note that Allied also paid additional fees to the South Carolina Dept. of Administration MMO (fees prescribed by MMO) for each individual provided by Allied to SCVRD pursuant to the statewide vendor contract.